IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

AMERICAN WASTE MANAGEMENT AND RECYCLING, LLC. Plaintiff, v. **CEMEX PUERTO RICO; CANOPY ECOTERRA, XYZ INSURANCE COMPANIES.** Defendants.	CIVIL NO.: 07- 1658 (JAF) BREACH OF CONTRACT; COLLECTION OF MONIES; and DAMAGES. JURY TRIAL DEMANDED

MOTION FOR LEAVE TO FILE REPLY

TO THE HONORABLE COURT:

NOW APPEARS Plaintiff **AMERICAN WASTE MANAGEMENT AND RECYCLING, LLC,** and through the undersigned attorneys, respectfully **STATES, ALLEGES** and **REQUESTS** as follows:

Today, CEMEX filed an opposition to Plaintiff's Motion Requesting Order (docket No. 19). Because Plaintiff submits that it is necessary to file a Reply to address co-Defendant's factual assertions as stated therein, *particularly their rendition of events that transpired when no CEMEX counsel was present during the inventory*, Plaintiff very respectfully requests that this Honorable Court grant them leave to file said reply.

WHEREFORE, Plaintiffs respectfully request that the Honorable Court **GRANT** the present motion in its entirety, and that it issue any further relief it deem just and proper under the law.

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RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 29th day of August, 2007.

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